

KTF:EWS
F. #2022R00289

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

JOSEPH ELIAS,

Defendant.

S U P E R S E D I N G
I N F O R M A T I O N

Cr. No. 22-CR-317 (S-1) (LDH)

(T. 18, U.S.C., §§ 844(c)(1), 844(m),
982(a)(2), 982(b)(1) and 3551 et seq.;
T. 21, U.S.C., § 853(p))

----- X

THE UNITED STATES ATTORNEY CHARGES:

ARSON CONSPIRACY

1. On or about March 22, 2022, within the Eastern District of New York and elsewhere, the defendant JOSEPH ELIAS, together with others, did knowingly and intentionally conspire to use fire to commit a felony which may be prosecuted in a court of the United States, to wit: the use of extortionate means to collect one or more extensions of credit from John Doe, an individual whose identity is known to the United States Attorney, in violation of Title 18, United States Code, Section 894, contrary to Title 18, United States Code, Section 844(h)(1).

(Title 18, United States Code, Sections 844(m) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 844(c)(1), which requires any person convicted of such offense to forfeit any explosive materials involved or used or intended to be used in any violation

of Title 18, United States Code, Section 844; and (b) Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 844(c)(1), 982(a)(2) and 982(b)(1); Title 21, United States Code, Section 853(p))

By Carolyn Pokorny, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2022R00289
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

JOSEPH ELIAS,

Defendant.

SUPERSEDING INFORMATION

(T. 18, U.S.C., §§ 844(c)(1), 844(m), 982(a)(2), 982(b)(1) and
3551 et seq.; T. 21, U.S.C., § 853(p))

A true bill.

Foreperson

Filed in open court this ----- *day,*

of ----- *A.D. 20* -----

Clerk

Bail, \$ -----

Eric Silverberg, Assistant U.S. Attorneys (718) 254-7000